REMARKS

This Amendment responds to the office action dated December 17, 2008.

The examiner has rejected claims 1-3, 7 and 8 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,985,245 by Takahashi (hereinafter Takahashi) in view of U.S. Patent No. 6,624,909 by Czyszczewski (hereinafter Czyszczewski). Claim 1 is independent. Claims 2, 3, 7 and 8 are dependent on claim 1 and comprise all the elements therein by dependence.

This rejection is improper as if fails to present a prima facie case of obviousness.

Takahashi teaches a server-based system (Fig. 1, 102) wherein client computing devices 103 send PDL print jobs to a network print server 102, which distributes the print jobs to one or more printing devices 104, 105 and 107. The method of Takahashi requires an extensive network system with a dedicated server and works outside the typical print system process by creating PDL files, which are then modified by the server.

Czyszczewski teaches a method wherein TIFF files are stored on a network resource that is accessible to a print server. Based on a user selection of high or low print quality, different parts of the TIFF file are read and printed. Czyszczewski teaches a GUI user interface on a client device that may be used to initiate the TIFF file print process (col. 7, lines 54-59).

Czyszczewski may teach a particular GUI client user interface for a printing system and Takahashi may teach a cluster printing system, but both of these methods are server-based systems that do not perform the claimed functions at the client device where the print job is initiated and both require specialized server hardware to effectuate their methods. Just because Czyszczewski teaches a print system component that is unrelated to the present claim elements

and Takahashi teaches a server-based system that performs some of the claimed functions does not mean that the combination of Czyszczewski and Takahashi teaches the claimed elements. The combination does not teach how to create a print system component that performs the claimed functions, but only shows how to perform some of the functions with a complex server-based system, which implements its functions with very different architecture and programming. Consequently, this combination of references does not teach all the elements of the claimed embodiments of the present invention.

Claim 1 and claims 2, 3, 7 and 8, dependent thereon, comprise the elements of:

> receiving a print task at a print system component, which resides *on a computing device from which said print task originates*;
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> receiving user input comprising a cluster printing selection *at said print system component* on said computing device, wherein said selection identifies specific printing devices and communicates a specific quantity of printing devices;
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> combining said print task with said cluster printing selection *using said print system component* on said computing device thereby creating driver-dependent data;
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> transmitting said driver-dependent data to a printer driver, *wherein said printer driver resides on said computing device*;
>
> creating spool data from said driver-dependent data, *using said printer driver on said computing device*;

determining, *with said print system component on said computing device*, portions of said spool data to be distributed to each of said specific printing devices;

These elements, which, as claimed, are all performed by a print system component that resides on the computing device from which the print job is initiated, are not taught in the combination of Takahashi and Czyszczewski.

The examiner has rejected claim 4 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,985,245 by Takahashi (hereinafter Takahashi) in view of U.S. Patent No. 6,624,909 by Czyszczewski (hereinafter Czyszczewski) and further in view of U.S. Patent No. 7,139,085 by Sakaguchi (hereinafter Sakaguchi).

This rejection is improper as it fails to present a prima facie case of obviousness. Claim 4 is dependent on claim 1 and comprises all the elements therein.

Sakaguchi teaches a method in which a printer group is selected, the capabilities of printers in the group are determined, the print job requirements are determined and a message is displayed informing the user that some printers in the group are not capable of printing the print job, after which a user is given the option to cancel the print job or send the job to the printers that are capable of handling the print job. However, Sakaguchi does not teach the use of a prompt that limits the user's selection of printers to a set of printers that are capable of meeting print job requirements. The method of the current claim limits the user's selection by automatic limitation of the set from which the user selects printers while Sakaguchi only allows selection of

a group before it is determined whether job requirements are met and then alerts the user and restricts the print job after the selection has already been made. The method of claim 4 allows a user to select from a group of available printers while Sakaguchi only allows a user to inhibit the print job completely or send to pre-selected printers that are available. Sakaguchi provides no way to select additional printers or deselect printers after the determination of what printers are available is made.

Czyszczewski teaches a method wherein TIFF files are stored on a network resource that is accessible to a print server. Based on a user selection of high or low print quality, different parts of the TIFF file are read and printed. Czyszczewski teaches a GUI user interface on a client device that may be used to initiate the TIFF file print process (col. 7, lines 54-59).

Accordingly, all the elements of claim 4 are not taught in the combination of Takahashi, Czyszczewski and Sakaguchi and the examiner is respectfully requested to reconsider this rejection.

The examiner has rejected claim 5 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,985,245 by Takahashi (hereinafter Takahashi) in view of U.S. Patent No. 6,624,909 by Czyszczewski (hereinafter Czyszczewski) and further in view of U.S. Patent No. 7,139,085 by Sakaguchi (hereinafter Sakaguchi)and further in view of U.S. Patent No. 5,287,194 by Lobiondo (hereinafter Lobiondo).

This rejection is improper as if fails to present a prima facie case of obviousness. Claim 5 is dependent on claim 1 and comprises all the elements therein.

Claim 1 and 5 relate to a single device on which a print task generating application resides. This is not taught in the cited combination of prior art. Czyszczewski teaches a GUI on the client device, but does not show other claimed elements on the device from which print jobs are initiated.

The examiner has rejected claims 6, 9-13, 15, 16, 18, 19, 23 and 24 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,985,245 by Takahashi (hereinafter Takahashi) in view of U.S. Patent No. 6,624,909 by Czyszczewski (hereinafter Czyszczewski) and further in view of U.S. Patent No. 5,287,194 by Lobiondo (hereinafter Lobiondo).

Claims 1, 11, 18, 23 and 24 are independent claims. Claims 6, 9 and 10 depend from claim 1. Claims 12, 13, 15 and 16 depend from claim 11. Claim 19 depends from claim 18.

This rejection is improper as it fails to present a prima facie case of anticipation. These claims and those dependent thereon relate to a single computing device on which all system functions reside. This device is not taught in the server-based systems of the prior art cited in this combination. Czyszczewski teaches a GUI on the client device, but does not show other claimed elements on the device from which print jobs are initiated. One skilled in the art does not take several server-based methods and combine them to form a client-based invention with client-based functions even when a client interface is known. The client-based functions other than the interface are not taught in the combination.

The examiner has rejected claims 14 and 17 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,985,245 by Takahashi (hereinafter Takahashi) (as modified

by Lobiondo and Czyszczewski) in view of U.S. Patent No. 6,049,394 by Fukushima (hereinafter Fukushima). Claims 14 and 17 depend from claim 11 and comprise all the elements therein.

This rejection is improper as it fails to present a prima facie case of anticipation. These claims relate to a single computing device on which all system functions reside as discussed above in relation to claim 1 and others. These elements are not taught in the server-based systems of the prior art as cited in this combination.

The examiner has rejected claim 20 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,985,245 by Takahashi (hereinafter Takahashi) (as modified by Lobiondo and Czyszczewski) in view of U.S. Patent No. 6,665,082 by Takeoka et al (hereinafter Takeoka). Claim 20 depends from claim 18 and comprises all the elements therein.

This rejection is improper as it fails to present a prima facie case of anticipation. This claim relates to a single computing device on which all system functions reside. This device is not taught in the server-based systems cited in this combination of the prior art. As stated above, in relation to claim 1 and other claims, the elements of claim 18 on which this claim depends are not taught in the cited combination of prior art.

Takeoka teaches a method of isochronous transfer of image data to a printer and mentions the term "storage capacity" in relation to a printer's buffer memory. This combination of cited references does not teach: combining cluster print data with print data to create pre-driver, driver-dependent data; determining portions of spool data to be distributed; and distributing portions of spool data to multiple printers with parallel

concurrent playback. Neither of these references manipulate spool data to achieve their functions and, therefore, do not teach these elements.

The examiner has rejected claims 21 and 22 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,985,245 by Takahashi (hereinafter Takahashi) (as modified by Lobiondo and Czyszczewski) in view of U.S. Patent No. 6,891,632 by Schwartz (hereinafter Schwartz). Claims 21 and 22 depend from claim 18 and comprise all the elements therein.

This rejection is improper as it fails to present a prima facie case of anticipation. Claim 18 and those dependent thereon now relate to a single computing device on which all system functions reside as explained above in relation to claim 1 and other claims. These elements are not taught in the server-based systems of the prior art.

Based on the foregoing remarks, the Applicant respectfully requests reconsideration and allowance of the present application.

Respectfully submitted,

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